

NOVA Gas Transmission Ltd.

Project Name: NGTL West Path Delivery 2022

**Submission Information**

**Submission Title:** NGTL West Path Delivery 2022 **Submission Date:** 01/06/2020  
**Filer:** David Yee - NOVA Gas Transmission Ltd. **Role:** Applicant  
**Form Version:** 24.00

**Applicant Information**

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**This application is pursuant to the following sections of the CER Act and OPR Regulations:****Sections of the NEB Act that apply:**

Section 211 - deviation, change or alteration of facilities

Section 97 - exemption from OPR



Section 214 - facilities exemption order

Exemptions / Relief Requested NOVA Gas Transmission Ltd. (NGTL), a wholly owned subsidiary of TransCanada PipeLines Limited (TCPL), an affiliate of TC Energy Corporation, applies to the Canada Energy Regulator (CER or Commission) pursuant to section 214 of the Canadian Energy Regulator Act (CER Act) for an order approving the construction and operation of NGTL West Path Delivery 2022 (Project). NGTL also applies for an exemption from the provisions of sections 180(1)(a) and 198 of the CER Act in respect of the Project.

NGTL is also requesting exemption from the requirements of sections 180(1)(b) and 213(1) of the CER Act to obtain leave to open (LTO) from the Commission prior to installing tie-in assemblies on the pipeline components of the Project and to put the meter station modifications component of the Project into service. See Attachment 1: LTO Exemption Request for details and rationale regarding the LTO Exemption Request

**OPR-99 Regulations that apply:**

OPR 43 - increase in MOP

OPR 44 - deactivation of facilities

OPR 45 - reactivation of facilities

**Project Description**

**Project Name:** NGTL West Path Delivery 2022  
**Proposed Construction Date:** 01/11/2021  
**Estimated Cost:** \$193,000,000.00  
**Project Purpose:** The Project is required to increase the NGTL system capacity to meet the contractual

obligations that result in the system Design Flows. The Project is underpinned by approximately 110 TJ/d of incremental Firm Transportation – Delivery (FT-D) service on the NGTL System to the ABC Border Meter Station.

**Brief Description of Work:**

The Project consists of two non-contiguous pipeline loop sections of 1219 mm outside diameter pipe (OD) Nominal Pipe Size (NPS) 48 natural gas pipeline that will loop NGTL's existing Edson Mainline Loop No. 4 and NGTL's existing Western Alberta System Mainline Loop No. 2; and expansion of NGTL's existing ABC Border Meter Station (No. 1 and No. 2). The Project parallels existing rights-of-way (ROW) where feasible.

**Edson Mainline Loop No. 4 - Raven River Section (Raven River Section)**

The Raven River Section consists of approximately 18 km of NPS 48 pipe and in line inspection (ILI) launcher and receiver facilities with a maximum operating pressure (MOP) of 8690 kPa. The pipeline segment will be located approximately 16 km northwest from the Town of Sundre, Alberta. The segment route will cross Crown (81%) and Freehold (19%) land starting from SW 02-036-07 W5M and ending at SE 26-034-06 W5M.

The required in-service date for the Raven River Section is April 2022.

The permanent ROW dimensions will vary between approximately 15 m to 32 m. The Raven River Section will require the acquisition of approximately 49.3 ha of new permanent land, 2.8 ha of which is within existing disturbances.

The Raven River Section route will parallel existing disturbances where feasible, including NGTL's existing Edson Mainline Loop No. 4, for approximately 79% of the pipeline route. Acquisition of new land for the pipeline segment and temporary workspace (TWS) during construction is anticipated to be required. NGTL will utilize local accommodations within nearby communities (Sundre, Olds, Rocky Mountain House, and/or Innisfail, Alberta) or temporary worker accommodation (camp) may be required.

**Western Alberta System (WAS) Mainline Loop No. 2 Alberta British Columbia Section (ABC Section)**

The ABC Section consists of approximately 5 km of NPS 48 pipe and ILI launcher and receiver facilities with a MOP of 8690 kPa. The pipeline segment will be located approximately 6 km west of the Town of Coleman, Alberta. The segment route will cross Crown (38%) and Freehold (62%) land starting from NW 11-008-05 W5M and ending at SW 17-008-05 W5M near the Alberta/British Columbia provincial border.

The required in-service date for the ABC Section is November 2022.

The permanent ROW dimensions will vary between approximately 15 m to 32 m. The ABC Section will require the acquisition of approximately 15.9 ha of new permanent land, 0.1 ha of which is within existing disturbances.

The ABC Section route will parallel existing disturbances where feasible, including NGTL's existing WAS Mainline Loop No. 2, for approximately 90% of the pipeline route. Acquisition of new land for the pipeline segment and TWS during construction is anticipated to be required. NGTL will utilize local accommodations within nearby communities (Pincher Creek and Blairmore, Alberta; and/or Sparwood, British Columbia) or a camp may be required.

**ABC Border Meter Station Expansion (ABC Border MS Expansion)**

The purpose of this Project component is to provide metering facilities for the measurement of natural gas for custody transfer between the NGTL System and Foothills Pipe Lines Ltd. (Foothills) System. The ABC Border MS Expansion will consist of modifications to NGTL's existing ABC Border Meter Station (No.1 and No. 2).

The required in-service date for the facility is November 2022.

The ABC Border MS Expansion will not require the acquisition of new land and will be entirely within the boundaries of NGTL's existing fenced ABC Border Meter Station site, located in NW 11-008-05 W5M, approximately 6 km west of the Town of Coleman, Alberta. NGTL anticipates requiring approximately 1.8 ha of TWS as part of the expansion activities outside the fenced meter station site; however, the TWS will be within NGTL-owned land.

Based on preliminary design, the modifications will include:

- Installation of one new NPS 20 ultrasonic meter run at ABC Border Meter Station No. 1 and the replacement of four existing NPS 20 orifice meter runs with ultrasonic meter runs at ABC Border Meter Station No. 2
- Replacement of four separators, including piping modifications as required to reconnect inlets, outlets, drain lines and other ancillary connections
- Replacement of one NPS 20 meter run isolation valve and valve operator
- Replacement of approximately 10 m of NPS 36 yard piping
- Installation of approximately 20 m of NPS 20 yard piping

Note: all dimensions for yard piping are approximate (see Attachment 4: Meter Station Technical Description).

Associated facility piping, valves, instrumentation, controls, communications devices and pipeline appurtenances are included in the meter station scope of work. All new above-ground facilities will be located in a fenced area.

The station will have a maximum operating pressure of 5820 kPa.

## Technical Description

### Proposed Facilities:

- ✓ Pipeline
- ✓ Pigging
- Compressor
- ✓ Metering Station
- Tank

### Integrity Management - Program Elements to be Employed on the Facility:

**Integrity Management:**

NGTL will implement TC Energy's comprehensive Integrity Management Program (IMP) to monitor and ensure the integrity of the Project. The IMP uses advanced inspection and mitigation techniques applied within a comprehensive risk based methodology. Risk assessment is used to identify potential integrity threats and initiate inspection and mitigation activities, while results from advanced inspections for known or suspected integrity threats are used to develop specific integrity maintenance activities. Implementation of the IMP will be used in the operations phase to:

- reduce the potential for adverse environmental effects
- protect the installed pipelines and facilities
- maintain reliability
- ensure the safety of the public and TC Energy personnel

Current regular preventative maintenance programs will be incorporated in the design and operation of the pipeline portion of the Project, including:

- aerial patrols
- internal inspections
- cathodic protection (CP) monitoring
- pipeline markers at roads and pipeline watercourse crossings

**Operations:**

TCPL operates the NGTL System pursuant to an Operating Agreement between TCPL and NGTL. TCPL applies corporate policies in its operation of the NGTL System that are common to TCPL's operations of other federally-regulated pipelines.

TCPL will operate the Project in accordance with all applicable legislation, codes and standards, including the Onshore Pipeline Regulations (OPR) (NEB 2016) and Canadian Standards Association Z662-19: Oil and Gas Pipeline Systems (CSA Z662-19), and approval conditions. The TC Energy Operations Control Centre in Calgary monitors and controls NGTL System operations.

**Management System Overview:**

TC Energy's Operational Management System (TOMS) applies across TC Energy. It will apply to the Project, and throughout its lifecycle (design, construction, operation, decommissioning or abandonment), to help ensure all of the Project's physical integrity, the safety and security of the public and TC Energy personnel, and the protection of the environment and property. TOMS is a structured set of requirements and processes to manage risk and set goals, objectives and targets for performance improvements, and to continually improve over time through assurance and management review activities. Regulatory requirements and industry best practices are incorporated through each of TOMS Elements, and Programs, which encompass the programs identified in the OPR. These Programs, which support Business Units, structure their requirements in alignment with TOMS Elements. Business Units, which develop and execute projects, implement TOMS and Program requirements.

**Construction & Inspection - Construction Techniques to be Employed:**

Before installing the Project facilities, the Project footprint will be surveyed to identify existing underground facilities. The Project footprint will be prepared by clearing, stripping and grading as required, and may include the use of temporary on-site construction trailers. The Project will be designed and constructed in accordance with all applicable legislation, codes and standards, including the OPR and CSA Z662-19, and approval conditions.

#### Raven River Section

Pipeline construction will include surveying, clearing, grading, pipe stringing, bending, welding, non-destructive testing, girth weld coating, open cut and shallow-bore construction methods, trenching, hydrovacating, lowering-in, backfilling, pressure testing, cleanup and reclamation.

The proposed route for the Raven River Section crosses a total of two watercourses (See Attachment 17: Appendix A: Summary of Watercourse Crossings for NGTL West Path Delivery 2022). The proposed primary crossing method for all watercourses is: isolated open-cut if water is present; dry open-cut if the watercourse is dry or frozen at the time of construction. The proposed contingency crossing method is trenchless.

The pipelines, as well as the related pipeline components, will be joined by mechanized and manual welding.

NGTL anticipates using one or both of open-cut or shallow-bore construction techniques for all third-party pipeline, road and utility crossings.

The pipeline will be pressure tested at a minimum of 125% of the design pressure. The mainline, valve assemblies, and receiver assembly will be shop tested and/or field tested when assembled.

NGTL is requesting LTO Exemption for three tie-in assemblies on the Raven River Section. NGTL will submit an LTO application for the remainder of this Project component upon completion of construction. See Attachment 1: LTO Exemption Request for details and rationale regarding the LTO Exemption Request.

#### ABC Section

Pipeline construction will include surveying, clearing, grading, pipe stringing, bending, welding, non-destructive testing, girth weld coating, open cut and shallow-bore construction methods, trenching, hydrovacating, lowering-in, backfilling, pressure testing, cleanup and reclamation.

The proposed route for the ABC Section crosses a total of two watercourses (See Attachment 17: Appendix A: Summary of Watercourse Crossings for NGTL West Path Delivery 2022). The proposed primary crossing method for all watercourses is: isolated open-cut if water is present; dry open-cut if the watercourse is dry or frozen at the time of construction. The proposed contingency crossing method is trenchless.

The pipelines, as well as the related pipeline components, will be joined by mechanized and manual welding.

NGTL anticipates using one or both of open-cut or shallow-bore construction techniques for all third-party pipeline, road and utility crossings.

The pipeline will be pressure tested at a minimum of 125% of the design pressure. The mainline, valve assemblies, and launcher and receiver assembly will be shop tested and/or field tested when assembled.

NGTL is requesting LTO Exemption for three tie-in assemblies on the ABC Section. NGTL will submit an LTO application for the remainder of this Project component upon completion of construction. See Attachment 1: LTO Exemption Request for details and rationale regarding the LTO Exemption Request.

#### ABC Border MS Expansion

For the ABC Border MS Expansion, before installing connections to the NGTL System, the Meter Station site will be surveyed to identify existing underground facilities, and the site will be prepared by stripping and grading as required and include the use of temporary on-site construction trailers. Standard construction techniques will be used for installation of the metering facilities and connections to the existing NGTL System.

NGTL is requesting LTO Exemption of the ABC Border MS Expansion component of the Project. See Attachment 1: LTO Exemption Request for details and rationale regarding the LTO Exemption Request.

**Construction & Inspection - Inspection Techniques and Relative Frequency of Inspection to be Employed:**

Project construction will be supervised and inspected by qualified Construction and Environmental Inspectors to ensure compliance with all applicable legislation, codes and standards, and approval conditions. Inspection personnel will be on-site for specific activities during construction when their oversight is required.

**Construction & Inspection - Major Milestones for the Project Schedule:**

The planned schedule is as follows:

- Complete detailed design: 11/2020
- CER decision requested: 02/2021
- Start construction: 11/2021
- Complete construction: 10/2022
- Planned in-service date: 11/2022

NGTL notes installation work and monitoring of spawning deterrents in the Raven River is planned to occur in August 2021; prior to the Restricted Activity Period (September 16 to April 15), potential fish spawning and the start of construction of the Raven River Section in November 2021.

**Document Attachments:**

Filename	Document Name	Language
Attachment 1_LTO Exemption Request.pdf	Attachment 1 - LTO Exemption Request	English
Attachment 2_Pipeline Technical Description.pdf	Attachment 2 - Pipeline Technical Description	English
Attachment 3_ILI Launcher and Receiver Technical Description.pdf	Attachment 3 - ILI Launcher and Receiver Technical Description	English
Attachment 4_Meter Station Technical Description.pdf	Attachment 4 - Meter Station Technical Description	English
Attachment 8_Pipeline Pressure Control and OPP Summary.pdf	Attachment 8 - Pipeline Pressure Control and OPP Summary	English
Attachment 9_Preliminary Standards_Specifications List.pdf	Attachment 9 - Pipeline and MS Preliminary Standards and Specifications List	English
Attachment 10_Preliminary Process Flow Diagrams.pdf	Attachment 10 - Preliminary Process Flow Diagrams	English
Attachment 11_Preliminary Plot Plan_ABC Border MS Expansion.pdf	Attachment 11 - Preliminary Plot Plan -ABC Border MS Expansion	English
Attachment 12_Preliminary PID_ABC Border MS Expansion.pdf	Attachment 12 - Preliminary PID - ABC Border MS Expansion	English

**Location**

**Document Attachments:**

Filename	DocumentName	Language
Attachment Placeholder.pdf	Attachment 13 - Global and Regional Maps	English
Attachment Placeholder.pdf	Attachment 14 - Detailed Maps	English
Attachment Placeholder.pdf	Attachment 15 - Aerial Overview ABC Border MS Expansion	English
Attachment Placeholder.pdf	Attachment 16 - Survey Plan and Access Map - ABC Border MS Expansion	English

**Manuals**

**Title****Revision / Publication****On File**

See Attachment 9: Preliminary Standards and Specifications List for a preliminary list of the applicable TC Energy engineering standards, specifications and operating procedures.

28/05/2020

yes

**Comments** NGTL's construction, design, materials, installation, joining and pressure testing of the Project will meet, or exceed, the requirements of CSA Z662-19 and the OPR.

**Applicant Self Assessment of Risk**



**Economics**

- ✓ EC1 There is or there will be adequate supply to support the use of the applied for facilities.
- ✓ EC2 The applied-for facilities are likely to be used at a reasonable level over their economic life.
- ✓ EC3 Adequate markets exist for the volumes that would be available as a result of the applied-for facilities.
- ✓ EC4 The Applicant has made arrangements with the operators of upstream and downstream facilities.
- ✓ EC5 The Applicant is able to finance the applied-for facilities and to safely operate, maintain and abandon the facilities.
- EC6 Select the option below that best applies to the project for current and potentially affected (includes possible but not yet actual) third party shippers.  
The applied-for facilities do not (and will not) have any third party shippers.  
  - ✓ The applicant has notified third party shippers about the project and they do not have any outstanding concerns about the impact of the project on tolls, tariffs, access or service.  
The applicant has not notified third party shippers about the project.  
The applicant has notified third party shippers about the project and there are outstanding concerns about its impact on tolls, tariffs, access or service.
- EC7 Select the option below that best applies to the project for current and potentially affected (includes possible but not yet actual) commercial third parties (e.g. suppliers, end users, and other pipelines).  
The applied-for facilities do not (and will not) have any commercial third parties.  
  - ✓ The applicant has notified commercial third parties about the project and they do not have any outstanding concerns about its impact.  
The applicant has not notified commercial third parties about the project.  
The applicant has notified commercial third parties about the project and there are outstanding concerns.
- ✓ EC8 The Applicant has undertaken an assessment to determine the impact the proposed facilities will have on its Abandonment Cost Estimate total for its CER-regulated pipelines.

**Rationale:****Emergency Management**

- ✓ EM1 The project will comply with the most recent version of all applicable acts, regulations, and standards, including the National Energy Board Onshore Pipeline Regulations and CSA Z662 Oil and Gas Pipeline Systems.

**Rationale:**

NGTL confirms that emergency management during Project construction will be governed by the Project-specific Emergency Response Plan, and during operations by TC Energy's overarching Emergency Management Corporate Program Manual and related operating procedures. As part of Project consultation activities NGTL provides information concerning Emergency Preparedness and Response to various parties, which may include potentially affected stakeholders, landowners and Indigenous communities, as appropriate. TC Energy publishes its Emergency Management Corporate Program Manual in accordance with Order AO-001-MO-006-2016. In the event of an emergency TC Energy's comprehensive Emergency Management Program would be activated. TCPL employees and contractors receive training for emergency events and if there is an incident, will work closely with landowners and impacted persons or groups, as well as authorities and emergency responders to manage the incident.

### **Engagement**

- ✓ EA1 The applicant has established, and filed with the CER, a corporate policy with respect to engagement, and the principles and goals that guide the applicant's Engagement Program.
- ✓ EA2 Engagement activities were designed and implemented for the Project.
- ✓ EA3 Potentially affected persons, groups or communities
  - EA3-1 There are no potentially affected landowners.
  - EA3-2 There are no potentially affected nearby residents who may see, hear, or smell the Project.
  - EA3-3 There are no potentially affected land or waterway users (e.g., guide-outfitters, recreational users, navigation user groups).
  - EA3-4 There are no potentially affected Municipalities.
  - EA3-5 There are no potentially affected Provincial or Territorial Governments (e.g. resource development, environment departments, heritage resources).
  - EA3-6 There are no potentially affected Federal Government Departments (e.g., Fisheries and Oceans Canada, Transport Canada, Environment and Climate Change Canada, Indigenous and Northern Affairs Canada).
  - ✓ EA3-7 There are no potentially affected Non-Government Organizations.
  - ✓ EA4 The Applicant can demonstrate that they have provided to all those identified in **EA3** all of the following:
    - Description of the Project
    - Description of potential impacts of the project
    - Description of how comments or concerns raised by potentially affected persons or communities will be addressed throughout your engagement process
    - Description of your company's dispute resolution (or landowner complaint) process
    - Information about the CER and its application review process (including the appropriate CER brochures and publications)
    - Notice of your company's intention to file an application to the CER for approval of the project
    - Notice that they can raise outstanding project-related concerns with the CER, (the CER encourages people to submit any concerns about the project as soon as possible and preferably within 14 days after the application has been filed)
    - Notice of the actual date of your company's filing, provided within 72 hours of filing the application with the CER, including information where to find the application and associated documents on the CER website.
  - EA5 All concerns about potential project impacts have been addressed.

### **Rationale:**

For further details, see Attachment 21: Engagement Matters Summary.

**Engineering**

- ✓ E1 The Project will comply with the most recent version of all applicable acts, codes and regulations, including the National Energy Board Onshore Pipeline Regulations (OPR), National Energy Board Processing Plant Regulations (PPR) and Canadian Standards Association (CSA) Z662 Oil and Gas Pipeline Systems.
- ✓ E2-1 The Project uses steel pipe (grade X70 or lower), employs a conventional design and construction approach, and does not involve new or unproven technology.
- ✓ E2-2 The Project involves only the use of water for facility pressure testing (including water/methanol mixture).
- ✓ E2-3 Project facilities will not be used for sour service.
- ✓ E2-4 Project facilities are not designed to transport CO<sub>2</sub>, slurry or commodities.
- E2-5 Project facilities do not traverse terrain where there is a potential for geohazards to occur.
- ✓ E2-6 Project facilities are not designed to transport high-vapour-pressure (HVP) product.
- ✓ E3-1 The Project will only use new pipeline materials.
- ✓ E3-2 The Project does not involve the reactivation of an existing pipeline.
- ✓ E3-3 The Project does not involve the flow reversal of an existing pipeline.
- ✓ E3-4 The Project does not involve a change in service fluid.
- ✓ E3-5 The Project does not involve an increased maximum operating pressure (MOP) to an existing pipeline.
- ✓ E3-6 The Project does not involve an increase in hydrogen sulphide (H<sub>2</sub>S) content above the maximum concentration specified on the existing approval.
- E4 The class location designation of the Project is Class 1 under Canadian Standards Association (CSA) Z662, Oil and Gas Pipeline Systems.
- ✓ E5 Project does not involve the construction or expansion of liquid tank storage facilities.
- ✓ E6 Project facilities are designed for passage of in-line inspection (ILI) tools and the proposed integrity management plan includes ILI runs as part of ongoing monitoring.
- ✓ E7 The Project does not involve any work requiring an Engineering Assessment as per Canadian Standards Association (CSA) Z662, Oil and Gas Pipeline Systems.

**Rationale:**

For further details see Attachment 5: Engineering Matters Summary.

**Environment**

- ✓ EV1 The Project will not involve an activity listed in the Impact Assessment Act, Regulations Designating Physical Activities.

**NOTE:** If the proposed project involves an activity designated under the Regulations Designating Physical Activities, the Online Application System **cannot be used** to prepare and file your application. Please prepare and file your application using the electronic document submission tool (<https://apps.cer-rec.gc.ca/efile/ElectronicDocumentSubmission.aspx?Language=English>). If you have questions about this process, please contact the CER at 403-292-4800 and ask for the Energy Adjudication Business Unit Administrator who can put you in touch with the appropriate Director.

- ✓ EV2 The Project is not located on federal lands, as defined under subsection 2(1) of the Impact Assessment Act.
- EV3 The Project will not take place within a provincially or federally designated environmentally sensitive area.
- EV4 The Project will not extend beyond the existing approved property limits or right-of-way; no new land will be acquired for the construction of the Project.
- ✓ EV5 An Environmental and Socio-economic Assessment (ESA) has been conducted to identify and document potential environment and socio-economic effects. This information does not normally have to be submitted but must be available for audit purposes.
- ✓ EV6 All elements for which there are potential interactions associated with the project have been indicated on the attached Environment and Socio-Economic Interactions Table. Applicant must submit an Environment and Socio-Economic Interactions Table (table will be filled in by applicant and attached to the application). Applicant can file a full ESA at their discretion. Note: This application may be delayed if the interactions table has not been completed and attached to this filing. [You can obtain a template here.](#) Once you have downloaded and completed the Interactions Table, create a PDF copy of the completed template to include with your application.
- EV7 There are no residual effects after applying mitigation (as detailed in response to EV6).
- ✓ EV8 All relevant government agencies have been consulted.
- ✓ EV8-1 Any concerns raised by the agencies consulted have been resolved.
- ✓ EV9 The Applicant commits to having and implementing an Environmental Protection Plan, or equivalent, onsite.

**Rationale:**

For further details, see Attachment 17: Environmental Assessment Summary, Attachment 18: Environmental Obligations Summary and Attachment 19: Interactions Table.

**Indigenous Matters**

- ✓ I1 The applicant has established, and filed with the CER, a copy of your Indigenous engagement policy.
- ✓ I2 Engagement activities with Indigenous peoples were designed and implemented for the Project.
- I3 There are no potentially affected Indigenous peoples.  
  
(Applicant must describe in the comment box how it concluded that there are no potentially affected Indigenous peoples. Note: the CER considers that Indigenous communities whose Traditional Territory is traversed by a Project may be potentially affected).
- ✓ I4 The Project does not traverse Indian Reserve Lands or Métis Settlement Lands.

- ✓ I5 The Applicant can demonstrate that they have provided to all those identified in I3 and I4 all of the following:
- Description of the Project
  - Description of potential impacts of the project
  - Description of how comments or concerns raised by potentially affected persons or communities will be addressed throughout your engagement process
  - Description of your company's dispute resolution (or landowner complaint) process
  - Information about the CER and its application review process including the appropriate CER brochures and publications
  - Notice of your company's intention to file an application to the CER for approval of the project
  - Notice that they can raise outstanding project-related concerns with the CER, (the CER encourages people to submit any concerns about the project as soon as possible and preferably within 14 days after the application has been filed)
  - Notice of the actual date of your company's filing, provided within 72 hours of filing the application with the CER, including information where to find the application and associated documents on the CER website.
- I6 All concerns raised by Indigenous peoples about potential project impacts have been addressed.

**Rationale:**

For further details, see Attachment 23: Indigenous Matters Summary.

**Land Matters**

- L1 The Project does not extend beyond existing land rights held by the Applicant.
- L2 The Project does not require any temporary workspace.
- L3 The Project does not require new permanent land rights.

**Rationale:**

For further details, see Attachment 22: Land Matters Summary.

**Security**

- ✓ Sec1 The project will comply with the most recent version of all applicable acts, regulations, and standards, including CSA Z246.1 Security Management for Petroleum and Natural Gas Industry Systems and the National Energy Board Onshore Pipeline Regulations.
- ✓ Sec2 The applicant has conducted and documented a security assessment for the project.
- ✓ Sec3 Based on the security assessment, the applicant has developed a Security Plan that is applicable to the project.

**Rationale:**

NGTL confirms that security management during Project construction and operations will be governed by TC Energy's Corporate Security Policy and any related operating procedures as amended from time to time. Project-specific security measures will be included in the Site-Specific Safety Plan and Project Security Plan.

**Socio Economics**

- ✓ S1 An Environmental and Socio-economic Assessment (ESA) has been conducted to identify and document potential environment and socio-economic effects. This information does not normally have to be submitted but must be available for audit purposes.

- ✔ S2 All elements for which there are potential interactions associated with the project have been indicated on the attached Environment and Socio-Economic Interactions Table.  
Applicant must submit an Environment and Socio-Economic Interactions Table.  
Applicant can file a full ESA at their discretion.  
Note: This application may be delayed if the interactions table has not been completed and attached to this filing.  
[You can obtain a template here.](#)  
Once you have downloaded and completed the Interactions Table, create a PDF copy of the completed template to include with your application.
- S3 There are no residual effects after applying mitigation (as detailed in response to S2).
- S4 Project does not require provincial or territorial heritage resources clearance or approval.

**Rationale:**

For further details, see Attachment 17: Environmental Assessment Summary, Attachment 19: Interactions Table and Attachment 20: Historical Resources Act Clearance.

**Document Attachments**

Filename	Document Name	Language
Attachment 5_Engineering Matters Summary.pdf	Attachment 5 - Engineering Matters Summary	English
Attachment 6_Desktop Geohazards Preliminary Assessment.pdf	Attachment 6_Desktop Geohazards Preliminary Assessment	English
Attachment 7_Class Location Map_Raven River Section.pdf	Attachment 7 - Class Location Map - Raven River Section	English
Attachment 17_Environmental Assessment Summary.pdf	Attachment 17 - Environmental Assessment Summary	English
Attachment 18_Environmental Obligations Summary.pdf	Attachment 18 - Environmental Obligations Summary	English
Attachment 19_Interactions Table.pdf	Attachment 19 - Interactions Table	English
Attachment 20_Historical Resources Act Clearance.pdf	Attachment 20 - Historical Resources Act Clearance	English
Attachment 22_Land Matters Summary.pdf	Attachment 22 - Land Matters Summary	English
Attachment 21_Engagement Matters Summary.pdf	Attachment 21 - Engagement Matters Summary	English
Attachment 23_Indigenous Matters Summary.pdf	Attachment 23 - Indigenous Matters Summary	English